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April 30, 2022

Honorable Andrew T. Baxter
U.S. Magistrate Judge
P.O. Box 7396
Syracuse, NY 13261-7396

Re: Puleo v. Masonic Medical Research Institute, et al.
Civil Act. No.: 6:20-cv-1593 (TJM/ATB)

Dear Judge Baxter:

Please receive this letter request for an approximate thirty (30) day extension for the close of the discovery and dispositive motion deadlines for the above captioned matter. Accordingly, the deadlines would be reset to May 31, 2022 for the close of discovery, and August 1, 2022 for the dispositive motion deadline.

Please be advised that all parties have been diligently prosecuting and defending the matter. In fact, Plaintiff Puleo, Defendant MMRI, Defendant Kontaridis, Defendant Zielinski, Amy Pietrafesa and David F. Schneeweiss have all been deposed. However, Lewis Guinther and Sarah Guinther are no longer under MMRI's employ and have not been deposed. Additionally, upon information and belief, they have moved out of state. Accordingly, Plaintiff is attempting to locate them for a deposition.

I thank the Court for its understanding and patience with this matter.

Respectively,

/s/ Zachary C. Oren

Zachary C. Oren, Esq.

CC: Adam P. Mastroleo, Esq. (*via cm/ecf filing*)
Hannah K. Redmond, Esq. (*via cm/ecf filing*)